

### **REMARKS**

Claims 23-68 are currently pending in the application. Claims 23, 43, and 56 are currently amended to clarify the claimed inventions as respectively embodied in these claims, without acquiescence in the cited basis for rejection or prejudice to pursue the original claims in a related application. Claims 69-74 are new. No new matter has been added.

#### **I. Rejections of Claims under 35 U.S.C. § 101**

Claims 56-68 stand rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. Claim 56 is currently amended to recite “wherein the means for determining comprises a processor” and are thus believed to have overcome the rejections. Applicants respectfully request withdrawal of the rejections and reconsideration of these claims.

#### **II. Claim Rejections - 35 USC § 102**

Claims 23-68 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Publication No. 2004/0066529 by Wu et al. (hereinafter Wu.)

Without acquiescence in the cited basis for rejections or prejudice to pursue the original claims in a related application, claim 23 is currently amended to clarify the subject matter and recites at least the following limitations. Claims 43 and 56 also recite similar limitations.

loading the collection partition into the computer-readable memory based on a result from the act of determining, wherein the at least one identified collection element is loaded into the computer-readable memory when the at least one identified collection element is not in the computer-readable memory, wherein another **collection partition is removed from the computer-readable memory** where there is insufficient space for loading the collection partition; and

(emphasis added.)

A. According to the Office action, a document page in Wu's approach and the elements that make up the page respectively disclose the collection partition and the subset of the collection elements. P. 11, May 19, 2008 Office action. The Office action further alleges that because "a subset of a set can be the set itself", Wu's all display content discloses the limitation of a subset of collection elements. Applicants respectfully disagree.

Claim 23 recites at least "the collection partition comprises a subset of the collection elements". In contrast, the Office action alleges that a document page in Wu discloses a collection partition, that elements of a page disclose the limitation of a subset of collection elements, and that all display content is also considered a subset of collection elements because a set can be its own subset.

Applicants respectfully submit that the logic in the above reasoning may be flawed. In essence, the Office action alleges that one document page discloses the limitation of a collection partition which comprises a subset of collection elements and that all display content can also be the subset. That is, according to this logic, a document page (which constitutes the collection partition according to the Office action) comprises all display content in Wu because a collection partition, according to claim 23, comprises the subset of collection elements. This clearly contradicts Wu's explicit disclosure that there may be multiple pages, ¶ [0044], where one document page clearly cannot comprise all display content which encompasses multiple document pages.

B. Applicants further respectfully submit that Wu does not disclose the claimed limitation of "wherein another collection partition is removed from the computer-readable memory where there is insufficient space for loading the collection partition" of claim 23.

In terms of removing collection partition from the computer-readable memory, Applicants respectfully submit that a document page in Wu's approach cannot be considered a collection partition for the following reasons.

Applicants respectfully point to ¶ 0044 where Wu explicitly discloses that “[a]n example of such permanently erased data may be display content data of a document element having been incorporated into a printed page, except data which will be utilized later in other pages.” ¶ [0044] (emphasis added.) That is, in Wu's approach, the document page is not removed, but only a part of the document page that is not needed in other pages is removed from the RAM. Moreover, Wu further discloses that “two or more display content data on the same page may be given different unloading priority.” ¶ [0087] (emphasis added.) That is, when it comes to the time to free up the RAM by removing display content data, Wu's approach gives different priorities to different display content data which results in one display content data being removed before another display content data. This again demonstrates that a document page in Wu's approach is not removed as what claim 23 recites.

Therefore, Applicants respectfully submit that a document page in Wu's approach does not and cannot disclose or suggest the claimed limitation of a “collection partition” because only a part of the document page but not the document page itself is removed when the RAM has insufficient space.

As such, Applicants respectfully submit that Wu does not disclose or suggest at least the foregoing limitations and thus may not be used to preclude the patentability of claims 23-68 under 35 U.S.C. § 102 for at least the foregoing reasons.

**III. New Claims**

In addition to their dependency from claim 23, Applicants further respectfully submit that Wu does not disclose or suggest the claimed limitations of claims 69-70 which are thus believed to be also allowable over Wu.

**CONCLUSION**

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Applicant(s) hereby explicitly retracts and rescinds any and all of the arguments and disclaimers presented to distinguish the prior art of record during the prosecution of all parent and related application(s)/patent(s), and respectfully requests that the Examiner re-visit the prior art that such arguments and disclaimers were made to avoid.

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Respectfully submitted,

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